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November 14, 2021

BY EMAIL

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

The parties respectfully submit this joint letter in response to the Court's email earlier today regarding prospective jurors that the Court proposes to strike from the list of jurors proceeding to voir dire.

I. The Parties' Positions Regarding the Court's List

The parties have conferred about the Court's proposed list of strikes. The government has no objection to the Court's proposal to strike all jurors on the list.

The defense largely agrees with the Court's proposal, but requests that a limited number of jurors on the list proceed to voir dire so that the Court can inquire further about the nature of any travel or hardship conflict that these jurors have identified.

More specifically, the defense agrees that the following jurors should be excused from voir dire:

23, 114, 215, 257, 338, 420, 422, 542, 561

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The defense proposes that the following jurors should proceed to voir dire so that the Court can inquire further about the travel or hardship reasons that may prevent them from serving as jurors on this case:

196, 290, 419, 562

II. Modified Defense Strikes

The defense also writes to advise the Court of a small number of prospective jurors that the defense intended to strike, but inadvertently indicated should proceed to voir dire. The defense believes that the following jurors should be stricken and should not proceed to voir dire:

92, 226, 404

We have conferred with the government about these proposed strikes. The government maintains its position that these jurors should proceed to voir dire.

Sincerely,

/s/ Christian Everdell
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cc: All Counsel of Record (By ECF)